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14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

15 DAVID STEBBINS,

16 Plaintiff,

18 v.

19 GOOGLE LLC,

20 Defendant.

) CASE NO.: 3:23-cv-00322-TLT  
)  
) **DECLARATION OF NEHA REDDY**  
) **IN SUPPORT OF DEFENDANT**  
) **GOOGLE LLC'S MOTION TO**  
) **DISMISS AND TO DECLARE**  
) **PLAINTIFF A VEXATIOUS**  
) **LITIGANT**

) Judge: Hon. Trina L. Thompson

) Action Filed: January 20, 2023  
)

1 I, Neha Reddy, declare as follows:


2 1) I am a Policy Specialist for Legal Investigations Support at Defendant Google LLC  
3 (“Google”). I submit this Declaration in support of Google’s accompanying Motion to Dismiss  
4 and to Declare Plaintiff a Vexatious Litigant. I have personal knowledge of the facts and  
5 circumstances described below, and would testify to them if called upon as a witness.

6 2) I understand that Plaintiff’s Complaint concerns a certain channel icon that was  
7 displayed on a YouTube channel called “Acerthorn The True Acerthorn,” which was formerly  
8 available on YouTube at <https://www.youtube.com/@acerthornthetrueacerthorn4532>. The  
9 channel was taken down by the channel operator shortly after Plaintiff filed his Complaint.

10 3) Attached as Exhibit A is a copy of the image that the channel operator used for the  
11 Acerthorn The True Acerthorn icon, as preserved by Google’s systems. The icon as it appeared  
12 on the channel was circular and thus cropped out the squared edges of the image.

13 4) Attached as Exhibit B is a copy of the channel background image (also known as a  
14 banner image) that was displayed behind the icon at issue.

15 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true  
16 and correct. Executed on March 6, 2023 in Seattle, Washington.

17  
18 By:   
19 Neha Reddy  
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